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Formed in the State of PA  
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Attorney for Movant

**ATTORNEY FOR MOVANT: ALLY CAPITAL**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN DIVISION**

IN RE:	§	CASE NO. 22-19628-ABA
	§	
ORBIT ENERGY & POWER, LLC, Debtor	§	CHAPTER 7
	§	
	§	Hearing date: May 14, 2024@10:00 A.M.
	§	
	§	<b><u>NOTICE OF MOTION TO VACATE</u></b>
	§	<b><u>AUTOMATIC STAY</u></b>

TO:

Albert Anthony Ciardi, III  
1905 Spruce Street  
Philadelphia, PA 19103

Orbit Energy & Power, LLC  
570 Mantua Blvd.  
Sewell, NJ 08080

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20 Brace Road, Suite 205  
Cherry Hill, NJ 08034  
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One Newark Center Ste 2100  
Newark, NJ 07102  
USTPRegion03.NE.ECF@usdoj.gov

PLEASE TAKE NOTICE that on **Tuesday, May 14, 2024 at 10:00 A.M.**, or as soon as the matter may be heard, the undersigned, attorneys for Secured Creditor **Ally Capital** its assignees and/or successors in interest, will move before the Honorable Andrew B. Altenburg Jr. of the United States Bankruptcy Court, 400 Cooper Street, 4th Floor, Camden, N.J. 08101 for the entry of an *Order Vacating the Automatic Stay* with respect to Debtor's 2020 Jeep Gladiator Crew Cab Rubicon 4WD 3.6L V6, V.I.N. 1C6JTBG5LL106371, and allowing Ally Capital to continue or institute a repossession action, by reason of the Debtor's failure to make regular monthly payments to Ally Capital.

Respectfully Submitted,

Lavin, Cedrone, Graver, Boyd & DiSipio  
Attorney for Movant

Dated : April 17, 2024

/s/ Regina Cohen

**Regina Cohen**